

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO: 0:22-CV-61553-WPD

CRUZ VALDIVIESO FIGUERA,

Plaintiff,

vs.

**ALL VIP CARE, INC., &
LIZ VELAZQUEZ McKINNON,**

Defendants.

**DEFENDANT'S REPLY TO CRUZ VALDIVIESO FIGUERA'S AFFIRMATIVE
DEFENSES PRESENTED IN HER ANSWER/AFFIRMATIVE DEFENSES TO THE
DEFENDANTS' COUNTER-COMPLAINT**

The Defendants ("Defendants") deny each and every Affirmative Defenses set forth by the Plaintiff CRUZ VALDIVIESO FIGUERA ("Plaintiff") in response to Defendants' Counter-Complaint, and demands strict proof thereof.

CERTIFICATIONS

I hereby certify that a copy of this pleading which was filed with the Clerk of the Court and was provided to: **Brian Howard Pollock, Esquire**, Fairlaw Firm, 135 San Lorenzo, Avenue, Suite 770, Coral Gables, FL 33146, Brian@fairlawattorney.com; **Toussaint Marcus Cummings, Esquire**, Quintairos, Prieto, Wood, and Boyer, 9300 South Dadeland Blvd, 4th Floor, Miami, FL 33156, toussaint@fairlawattorney.com; and all attorneys listed on and via the ECM System on **May 2, 2023**.

/s/ RANDY M. GOLDBERG, ESQUIRE

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